

Stephen Schombel  
2200 Applewood Lane  
Missoula, MT 59801  
(406)-721-4686

Dan Ritter, Stevensville District Ranger  
88 Main  
Stevensville, MT 59870

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cc: Ravalli County Commissioners  
215 S. 4th Street, Suite A  
Hamilton, MT 59840

**Ravalli County Commissioners**



Ladies and Gentlemen:

I have some comments on the Bitterroot N.F. Travel Plan. Since this is a scoping period I'll be brief on my philosophy and get to the details. I feel strongly about the Wilderness Study Areas and would like to see them become Designated Wilderness some day. I strongly believe that the Forest Service has ignored the spirit and directives, if not the details, of court decisions and wilderness discussions that have taken place over the past 30 years by allowing ever increasing motorized use in the WSA's instead of trying to keep the level of use where it was 30 years ago. The Roadless Conservation Rule of 2001 also called for continuing the type of usage that was occurring at that time. It had language about the pristine nature of these roadless areas, and maintaining wildlife habitat and scenic and recreational opportunities. It did not prohibit motorized trail use, but to plan to create motorized trail loops and to promote exceptional back country motorized trails really contradicts the intent of the Roadless Conservation Rule.

It is not too late to correct some past mistakes. There are many good things in the proposed plan that are a step in the right direction. One of the best ideas is to close to motorized use the trails that lead from the west side of the valley into the Selway Bitterroot Wilderness. Please keep all these closures in your plan. But there are some omissions. In the Stevensville District there is trail #392. This trail fits the pattern of the others in that it leads from an overlook into the wilderness. Plus there is a special use permit cabin nearby heavily used by back country skiers. This trail really deserves to be added to the list of closures. Also in the Stevensville District I came across some user created trails off the end of road 1319. I did not hike them but one was headed toward the wilderness which was only a couple of miles away. This area should be investigated. In the Darby District there are trails nos. 125 and 208. These trails do not enter the wilderness, but come close. Trail 125 leads to a chain of pristine lakes with good cut-throat fishing. It is a short, easy hike for families and older people. This area should remain as is and not allowed to be overrun by motorized use. Trail 208 leads to the top of Ward Mountain. You certainly shouldn't allow people to ride motorbikes to the top of 9,000 ft. mountains. Please add both of the above to the list of trails that will be closed. In the West Fork district there is trail #12. It is one of the trails that lead from a road into the wilderness, and fits the pattern of those that should be closed to motorized use. Also, I like to hike in the Larry and Bass Creek area, and would agree on changing Rd. 1316, Lower Larry Loop, to non-motorized. The other road is fine for access to the viewpoint.

Over on the east side of the valley, in the Northern Sapphires, all of the proposed changes look good. The trails near Cleveland Mountain fit the pattern of trails leading into an existing Wilderness Area, and I'm glad you are proposing to keep the Stony Mountain IRA non-motorized.

The area between the Stony Mountain IRA and the Skalkaho Pass Road is already heavily roaded, so, although it is not my personal taste, I would not object to motorized use to continue in this area. The one exception would be a short section of trail 44, from the junction of trail 88 up to trail 313. This would be consistent with the proposals in the Darby Ranger District to limit motorized access to trail 313, the Sapphire Crest Trail, which is non-motorized. The map also shows a lot of switchbacks on this section, so it probably is steep and prone to erosion.

In the Darby and Sula Districts is the Sapphire Wilderness Study Area, a magnificent area that should be managed to maintain its wilderness, and roadless, characteristics, so as to remain eligible for inclusion into the Wilderness System. The idea is great to maintain the non-motorized status of trail 313, the Sapphire Crest Trail. It is also great to propose closing some of the trails leading up to #313 south of Skalkaho Pass. But why stop at just 3 trails? Trail 87 and 102 in the Darby District also lead to trail 313, so why not close them also? And then there is trail 83, a short trail from #313 into some lakes. Since trail 313 is closed to motorized use there is no legal way to get motorized vehicles on trail 83, so it also should be closed. Then in the Sula District are trails 39 and 168, which also lead to trail 313. This is the heart of the wilderness study area, so please do the right thing this time and follow the above philosophy: close these trails to motorized use to limit access to the Sapphire Crest Trail 313, and to keep the area eligible to become a Wilderness Area. In the middle of this area are several lakes, accessed by short trails closed to motorized use. This creates an impossible enforcement situation, since the area is so far from the nearest road. Near the southern area of the Sapphire WSA is trail 40. This trail leads up to an old mining area, in addition to leading to trail 313. But, to be consistent with the way I would like to see the Sapphire WSA and the Sapphire Crest Trail 313 managed, I'd like to see this trail added to the list of those closed to motorized use.

Thanks for proposing to close roads and trails along impaired streams and in areas where sediment would be stirred up. This is very important. Examples would be in the Rye, Lyman and Tepee Creek drainages, among others. Also good is the proposal to close to motorized use some of the roads and trails that cross private or State Lands. It would be great to have more consistent rules among various agencies.

I think you should get some more feedback from residents in the Hart Bench and Chaffin and Trapper Creek areas before you allow this to become a heavily used motorized area. I know that a whole lot of comments and objections to the Tri State Rule were submitted trying to get the language changed from "existing route" to "designated route." Even though this change was not made I still object strongly to any user created or renegade routes becoming permanent and designated as open.

Another good proposal is to keep the Continental Divide Trail non-motorized for as much of its length as possible. Trail #9 should be non-motorized, and the trails leading up to it. This should include both part of trail #78 and 173. You should also close the roads that touch the Continental Dived Trail, or that run close to it. These would include roads 725, 73548, 73537 and spurs off of it.

Also good is the proposal to close to motorized use trails leading into the Anaconda-Pintlar Wilderness. This is consistent with proposals around other Wilderness Areas. These would include trails 170, part of 171, 436, 434 and 462. But why not close to motorized use roads that come very close to the Wilderness boundary, such as 73588, upper 5770, 13360 and 73615? Only roads that are really needed, such as those leading to a lookout or a trailhead, should remain open to motorized use.

West of Lost Trail Pass is the large, sensitive Allen Mountain Inventoried Roadless Areas. Again, I feel that the Roadless Conservation Rule called for preserving the pristine character of these areas, preserving secure wildlife habitat, etc. I'd like to see these areas become non-motorized. In the Sula Ranger District I urge you to keep all proposed closures to motorized use, and to add all of trail #177, trs. 205, 728, 178, 103, 673, 400, 196, 56 and 601. Plus close user created trails and consider closing and decommissioning the seasonal part of road 728 and spurs 73365, 13369, 13370 and 13771. In the West

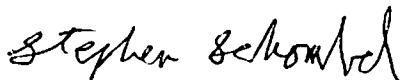
Fork Ranger District please keep all proposed closures, and add trails #676, 248, 182, 674 , 650 and the Jew Mountain Loop. Consider closing and decommissioning roads 5706 beyond the point of the seasonal closure, plus spurs leading off of it like 13400, 74221, 5706A, 5702; likewise road 49 and its spurs like 74332, 13421, 74339, 13403, 74606; likewise the seasonal part of road 5693 and spurs 74287 and 5694. The best part of the Allen Mountain IRA is along the Bitterroot Divide from Saddle Mountain to east of the Blue Nose Lookout where road 38 reaches the crest. I would like to see the entire Allen Mountain IRA upgraded to a Wilderness Study Area. But I'd like special attention paid to keeping the trail along the divide, and trails and roads leading up to it, non-motorized and free from incursions. This area has the scenery and quiet back country areas equal to the Continental Divide Trail to the east. Trail 106 certainly should be non-motorized, along with trails 606, 184 and 95. Road 5688 should be closed and decommissioned.

I've all ready commented on trails leading into the Selway-Bitterroot Wilderness such as Shepherd Creek and Boulder Point. I won't argue with the short roads in Lavene Creek but agree with a seasonal closure to the upper part of the Soda Springs Road 5635. I also agree that, due to the stream crossing and the steep grade, trail #183 should be closed to motorized use.

There is a Blue Joint Wilderness Study Area clearly marked out on the map. The entire area received a lot of support for inclusion into the Wilderness System at previous hearings. I doubt that there has ever been any public discussion about splitting off a large part of this Wilderness Study Area so that it can become an area of loop trails for motorized vehicles. Before such action is taken hearings must be held and a comment period established. You should not brush off part of this area in the back pages of a Travel Management Plan. Keep the Blue Joint Wilderness Study Area intact. Keep the proposed non-motorized changes to trail nos. 16, 614, 627, 137 and 233. But also add to the non-motorized list trails nos. 223, 106, 138, 139 and 602. Also consider closing and decommissioning road 74151, 74159, 1381 and 44 past the Reynold Lake Trailhead.

I hope you will incorporate many of these recommendations into your Travel Management Plan.

Thank you,

A handwritten signature in cursive script that reads "Stephen Schombel".

Stephen Schombel